

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION**

JOHN DOE, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

THE CORPORATION OF MERCER  
UNIVERSITY, d/b/a MERCER  
UNIVERSITY,

Defendant.

Case No. 3:23-cv-00087-TCB

**UNOPPOSED MOTION TO TRANSFER**

Plaintiff John Doe (“Plaintiff”), by and through his undersigned counsel, respectfully moves this Court to transfer this Action to the Middle District of Georgia. Good cause exists for this request because:

1. The Corporation of Mercer University, d/b/a Mercer University (“Defendant”) maintains its principal place of business in Macon, Georgia, within the Middle District of Georgia;
2. Three other related actions (*Wang v. Corporation of Mercer University*,

5:23-cv-00193; *Lehnes v. Mercer University*, 5:23-cv-00195; and *Ramos v. Mercer University*, 5:23-cv-00197) against Defendant have been filed in the Middle District of Georgia;

3. Defendant does not oppose the relief sought by this Motion. Defendant and Plaintiff have conferred and have agreed to pursue a path of consolidation with these matters as a matter of efficiency and judicial economy;

For the above reasons, the Parties respectfully request that the Court transfer this Action to the Middle District of Georgia.

A Proposed Order is attached hereto as Exhibit A.

Respectfully submitted this 27<sup>th</sup> day of July, 2023.

Dated: July 27, 2023

Respectfully submitted,

By: Robert E. Jones, Esq.  
Robert E. Jones, Esq.  
Georgia Bar No. 398206  
*rob@robjoneslaw.com*  
**THE JONES LAW FIRM, P.C.**  
1100 Peachtree Street  
Suite 950  
Atlanta, GA 30309  
Telephone: (404) 877-2345

Michael R. Reese (*pro hac vice*)  
*mreese@reesellp.com*  
**REESE LLP**  
100 West 93rd Street, 16th Floor  
New York, New York 10025

Telephone: (212) 643-0500

Facsimile: (212) 253-4272

Charles D. Moore (*pro hac vice*)

*cmoore@reesellp.com*

**REESE LLP**

100 South 5<sup>th</sup> Street, Suite 1900

Minneapolis, Minnesota 55402

Telephone: (212) 643-0500

Kevin Laukaitis (*pro hac vice*)

*klaukaitis@laukaitislaw.com*

**LAUKAITIS LAW LLC**

954 Avenida Ponce De Leon

Suite 205, #10518

San Juan, PR 00907

Telephone: (215) 789-4462

*Counsel for Plaintiffs John Doe and the  
Proposed Class*

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1D, I hereby certify that this brief has been prepared in Times New Roman, 14-point font, one of the font and point selections approved by this Court in Local Rule 5.1C.

By: Robert E. Jones, Esq.

Robert E. Jones, Esq.

Georgia Bar No. 398206

*rob@robjoneslaw.com*

**THE JONES LAW FIRM, P.C.**

1100 Peachtree Street

Suite 950

Atlanta, GA 30309

Telephone: (404) 877-2345

*Counsel for Plaintiffs John Doe and the  
Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

This 27<sup>th</sup> day of July, 2023.

By: Robert E. Jones, Esq.

Robert E. Jones, Esq.

Georgia Bar No. 398206

*rob@robjoneslaw.com*

**THE JONES LAW FIRM, P.C.**

1100 Peachtree Street

Suite 950

Atlanta, GA 30309

Telephone: (404) 877-2345

*Counsel for Plaintiffs John Doe and the  
Proposed Class*